

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DO NO HARM, a nonprofit corporation
incorporated in the State of Virginia,

Plaintiff,

v.

WILLIAM LEE, in his official capacity as
Governor of the State of Tennessee,

Defendant.

No. 3:23-cv-01175

**JUDGE CAMPBELL
MAGISTRATE JUDGE HOLMES**

DECLARATION OF KRISTINA RASMUSSEN

I, Kristina Rasmussen, declare as follows:

1. I am over 18 years old, of sound mind, and otherwise competent to sign this declaration.
2. I am the Executive Director of Do No Harm.
3. Do No Harm is a nationwide membership organization consisting of a diverse group of physicians, healthcare professionals, medical students, patients, and policymakers who want to protect healthcare from radical, divisive, and discriminatory policies. Do No Harm is opposed to membership on medical boards and commissions being chosen based on race.
4. Do No Harm accomplishes its mission through education and advocacy. It draws attention to racially exclusionary policies adopted and enforced by governments in the medical field.
5. Do No Harm's members are harmed by racially exclusionary boards and commissions like the Tennessee Board of Podiatric Medical Examiners (Board). This Board discriminates against some of Do No Harm's members solely because of their race.
6. Do No Harm Member A has been a licensed podiatrist in Tennessee for over 30 years. He is a male who is not a member of a racial minority. He resides in Tennessee, and he practices

podiatry in Tennessee. Member A is qualified, ready, willing, and able to be appointed to the Board of Podiatric Medical Examiners.

7. Do No Harm Member B is Tennessee citizen. He has resided in Tennessee for over 27 years. He does not engage in any profession, business, or activity subject to regulation by the Board. Member B is qualified, ready, willing, and able to be appointed as a citizen member to the Board of Podiatric Medical Examiners.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 13, 2024

/s/ Kirstina Rasmussen
Kristina Rasmussen
Executive Director of Do No Harm.